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September 15, 2014

*Via ECF and e-mail: [Schofield\\_NYSDChambers@nysd.uscourts.gov](mailto:Schofield_NYSDChambers@nysd.uscourts.gov)*

Honorable Lorna G. Schofield  
United States District Court  
40 Foley Square  
New York, New York 10007

RE: **ZINZ V. EMPIRE CITY SUBWAY COMPANY (LIMITED)**  
**Docket no.1:13-cv-04415 (LGS)**

Dear Judge Schofield:

We represent the plaintiff in the above matter and are writing to respectfully request permission to file a Memorandum of Law in Opposition in excess of the Court's twenty-five (25) page limit.

As the docket sheet reflects, defendants The City of New York, Empire City Subway and Consolidated Edison have all moved for summary judgment.

Plaintiff is consolidating his opposition into a single Memorandum of Law in Opposition to all three motions.

Plaintiff respectfully requests that he be permitted ten (10) additional pages for his Memorandum of Law in Opposition to the three summary judgment motions.

Respectfully submitted,

*Elizabeth Eilender*

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cc: *Via e-mail and ECF*

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